IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO EASTERN DIVISION

UNITED STATES OF AMERICA,) CASE NO.
Plaintiff,)) JUDGE
v.	
\$7,877.00 IN U.S. CURRENCY SEIZED ON JANUARY 17, 2020,)))
Defendant.) COMPLAINT IN FORFEITURE

NOW COMES plaintiff, the United States of America, by Justin E. Herdman, United States Attorney for the Northern District of Ohio, Henry F. DeBaggis and James L. Morford, Assistant U.S. Attorneys, and files this Complaint in Forfeiture, respectfully alleging, in accordance with Supplemental Rule G(2) of the Federal Rules of Civil Procedure, as follows:

JURISDICTION AND INTRODUCTION

- 1. This Court has subject matter jurisdiction over an action commenced by the United States under 28 U.S.C. Section 1345, and over an action for forfeiture under 28 U.S.C. Section 1355(a). This Court also has jurisdiction over this particular action under 18 U.S.C. Section 981(a)(1)(C).
- 2. This Court has *in rem* jurisdiction over the defendant currency: (i) pursuant to 28 U.S.C. Section 1355(b)(1)(A) because acts giving rise to the forfeiture occurred in this district; and, (ii) pursuant to 28 U.S.C. Section 1355(b)(1)(B), incorporating 28 Ú.S.C. Section 1395,

because the action accrued in this district. This Court will have control over the defendant currency through service of an arrest warrant *in rem*, which the USPS will execute upon the defendant currency. *See*, Supplemental Rules G(3)(b) and G(3)(c).

- 3. Venue is proper in this district: (i) pursuant to 28 U.S.C. Section 1355(b)(1)(A) because acts giving rise to the forfeiture occurred in this district; and, (ii) pursuant to 28 U.S.C. Section 1395 because the action accrued in this district.
- 4. On January 17, 2020, the defendant \$7,877.00 in U.S. Currency was seized from Joel Veizer's residence at XXXX Marengo Street, Toledo, Ohio. The seizure was made by Postal Inspectors with the United States Postal Service (USPS) pursuant to a written Consent to Search form executed by Joel Veizer on January 17, 2020. In addition, on January 17, 2020, Joel Veizer executed a Surrender of Ownership form in which he agreed to voluntarily relinquish any claims, rights, interest, and ownership to the \$7,877.00 in U.S. Currency in any forfeiture and/or abandonment proceedings, whether criminal, civil, state or federal. The defendant currency is now in the custody of the federal government.
- 5. Subsequent to the seizure, the USPS commenced an administrative forfeiture proceeding against the defendant currency. A claim to the defendant currency was submitted by Joel Veizer in the administrative forfeiture proceeding, thereby requiring the filing of this judicial forfeiture action.
- 6. The defendant currency is subject to forfeiture to the United States under 18 U.S.C. Section 981(a)(1)(C) in that Joel Veizer did steal a thing of value from an agency of the United States, i.e. he stole stamps from the USPS then sold the stamps and kept the proceeds.

Case: 3:20-cv-01281 Doc #: 1 Filed: 06/11/20 3 of 6. PageID #: 3

FORFEITURE

- 7. In October 2019, the manager at the South Toledo Post Office discovered that postage stamps had been stolen from the post office and an audit of the stamp stock identified a loss in excess of \$11,000.00. The manager believed that the stamps were stolen by an unknown employee and that the thefts likely started as early as June 2019.
- 8. After review of video surveillance of the vault at the South Toledo Post Office where the stamps are stored, it was determined that there were six (6) instances, between January 8, 2020, and January 15, 2020, in which the same individual entered the vault after normal business hours (the instances were between 7:42 p.m. and 10:48 p.m.) and removed stamps.
- 9. On January 16, 2020, USPS Office of Inspector General (OIG) special agents conducted surveillance at the South Toledo Post Office. Agents observed an individual matching the description of the individual referenced in paragraph 8, enter the South Toledo Post Office by using a cypher code at one of the employee entrances, which triggered the silent alarm.
- 10. The individual was in the post office for approximately ten (10) minutes and visited numerous areas, including the vault where the stamp stock is stored. After the individual exited the building and got into his vehicle, he was stopped and detained by USPS OIG special agents.
- 11. The individual was identified as Joel Veizer, a letter carrier at the South Toledo Post Office. Veizer was found to be in possession of ten (10) coils of first-class stamps (1,000 stamps), four (4) sheets of first-class stamps (80 stamps), and a Glock 17 handgun.
- 12. Veizer admitted to USPS OIG special agents that he had been entering the South Toledo Post Office after normal business hours, that he stole stamps that evening and he was

stealing stamps for several months and then selling the stamps on Facebook Marketplace (Toledo).

- 13. Veizer told USPS OIG special agents that he used his own Facebook account to post the stamps for sale, he was not aware that he was setting off the alarm when he entered the post office after hours and he admitted some of the stolen stamps were still at his residence.
- 14. Veizer provided USPS OIG special agents with verbal and written consent to search his residence located at XXXX Marengo Street, Toledo, Ohio.
- 15. USPS OIG special agents conducted a search of Veizer's residence and seized the defendant \$7,877.00 in U.S. Currency as well as stamps valued at approximately \$4,747.10.
- 16. Veizer admitted to USPS OIG special agents that the \$7,877.00 in U.S. Currency was proceeds from the sale of the stolen stamps.
- 17. Following his admissions of guilt, Veizer signed a Surrender of Ownership form for the U.S. Currency in which he agreed not to file a claim or otherwise contest any forfeiture or abandonment action initiated against the U.S. Currency seized.

CONCLUSION

18. By reason of the foregoing, the defendant \$7,877.00 in U.S. Currency is subject to forfeiture to the United States under 18 U.S.C. § 981(a)(1)(C) and 18 U.S.C. § 641 as he converted postage stamps which he stole from the USPS to the subject U.S. Currency.

WHEREFORE, plaintiff, the United States of America, requests that this Court enter judgment condemning the defendant currency and forfeiting it to the United States, and providing that the defendant currency be delivered into the custody of the United States for disposition according to law, and for such other relief as this Court may deem proper.

Respectfully submitted,

Justin E. Herdman United States Attorney Northern District of Ohio

By:

Henry F. DeBaggis (OH: 0007561)
James L. Morford (OH: 0005657)
Assistant United States Attorney
Carl B. Stokes U.S. Court House
801 West Superior Avenue, Suite 400
Cleveland, Ohio 44113
216.622.3749 / Fax: 216.522.7499
Henry.DeBaggis@usdoj.gov

Case: 3:20-cv-01281 Doc #: 1 Filed: 06/11/20 6 of 6. PageID #: 6

VERIFICATION

STATE OF OHIO)	
)	SS
COUNTY OF CUYAHOGA).	

I, James L. Morford, under penalty of perjury, depose and say that I am an Assistant United States Attorney for the Northern District of Ohio, and the attorney for the plaintiff in the within entitled action. The foregoing Complaint in Forfeiture is based upon information officially provided to me and, to my knowledge and belief, is true and correct.

James L. Morford (OH: 0005657) Assistant United States Attorney

Sworn to and subscribed in my presence this 11th day of June, 2020.

Notary Public

EDWARD F. FERMI, Alterney
NOTARY PUBLIC — STATE OF CASO
My commission has no expiration date.
Section MAGE R.

Case: 3:20-cv-01281_Doc.#: 1-1_Filed: 06/11/20_1 of 3. PageID #: 7

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS	ocket sheet. (SEE INSTRUC.	HONS ON NEAT FAGE OF TH	DEFENDANTS					
(b) County of Residence of First Listed Plaintiff (EXCEPT IN U.S. PLAINTIFF CASES) (c) Attorneys (Firm Name, Address, and Telephone Number)			County of Residence of First Listed Defendant (IN U.S. PLAINTIFF CASES ONLY) NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED. Attorneys (If Known)					
II. BASIS OF JURISDI	ICTION (Place an "X" in O	ne Box Only)	I. CITIZENSHIP OF P	RINCIPAL PARTIES	(Place an "X" in One Box for Plaintig			
☐ 1 U.S. Government Plaintiff	ernment			TF DEF 1				
☐ 2 U.S. Government Defendant	☐ 4 Diversity (Indicate Citizenshi	ip of Parties in Item III)	Citizen of Another State	itizen of Another State				
			Citizen or Subject of a Foreign Country	3	□ 6 □ 6			
IV. NATURE OF SUIT		ly) RTS	FORFEITURE/PENALTY	Click here for: Nature of BANKRUPTCY	of Suit Code Descriptions. OTHER STATUTES			
□ 110 Insurance □ 120 Marine □ 130 Miller Act □ 140 Negotiable Instrument □ 150 Recovery of Overpayment & Enforcement of Judgment □ 151 Medicare Act □ 152 Recovery of Defaulted Student Loans (Excludes Veterans) □ 153 Recovery of Overpayment of Veteran's Benefits □ 160 Stockholders' Suits □ 190 Other Contract □ 195 Contract Product Liability □ 196 Franchise REAL PROPERTY □ 210 Land Condemnation □ 220 Foreclosure □ 230 Rent Lease & Ejectment □ 240 Torts to Land □ 245 Tort Product Liability □ 290 All Other Real Property	□ 330 Federal Employers' Liability □ 340 Marine □ 345 Marine Product Liability □ 350 Motor Vehicle □ 355 Motor Vehicle □ 700 Product Liability □ 360 Other Personal Injury □ 362 Personal Injury - Medical Malpractice CIVIL RIGHTS □ 440 Other Civil Rights □ 441 Voting □ 442 Employment □ 443 Housing/ Accommodations □ 445 Amer. w/Disabilities - Employment □ 446 Amer. w/Disabilities - Other □ 448 Education	PERSONAL INJURY 365 Personal Injury - Product Liability 367 Health Care/ Pharmaceutical Personal Injury Product Liability 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY 370 Other Fraud 371 Truth in Lending 380 Other Personal Property Damage Product Liability PRISONER PETITIONS Habeas Corpus: 463 Alien Detainee 510 Motions to Vacate Sentence 530 General 535 Death Penalty Other: 540 Mandamus & Other 550 Civil Rights 555 Prison Condition 560 Civil Detainee - Conditions of Confinement	☐ 625 Drug Related Seizure of Property 21 USC 881 ☐ 690 Other	□ 422 Appeal 28 USC 158 □ 423 Withdrawal 28 USC 157 PROPERTY RIGHTS □ 820 Copyrights □ 830 Patent □ 835 Patent - Abbreviated New Drug Application □ 840 Trademark SOCIAL SECURITY □ 861 HIA (1395ff) □ 862 Black Lung (923) □ 863 DIWC/DIWW (405(g)) □ 864 SSID Title XVI □ 865 RSI (405(g)) FEDERAL TAX SUITS □ 870 Taxes (U.S. Plaintiff or Defendant) □ 871 IRS—Third Party 26 USC 7609	□ 375 False Claims Act □ 376 Qui Tam (31 USC 3729(a)) □ 400 State Reapportionment □ 410 Antitrust □ 430 Banks and Banking □ 450 Commerce □ 460 Deportation □ 470 Racketeer Influenced and Corrupt Organizations □ 480 Consumer Credit (15 USC 1681 or 1692) □ 485 Telephone Consumer Protection Act □ 490 Cable/Sat TV □ 850 Securities/Commodities/ Exchange □ 890 Other Statutory Actions □ 891 Agricultural Acts □ 893 Environmental Matters □ 895 Freedom of Information Act □ 896 Arbitration □ 899 Administrative Procedure Act/Review or Appeal of Agency Decision □ 950 Constitutionality of State Statutes			
☐ 1 Original ☐ 2 Re Proceeding Sta	moved from 3 tte Court Cite the U.S. Civil Sta	Appellate Court						
VII. REQUESTED IN COMPLAINT: VIII. RELATED CASE	CHECK IF THIS UNDER RULE 2	IS A CLASS ACTION	DEMAND \$	CHECK YES only JURY DEMAND	if demanded in complaint: : □ Yes □ No			
IF ANY	(See instructions):	JUDGE		DOCKET NUMBER				
DATE		SIGNATURE OF ATT /	- lemit any					
FOR OFFICE USE ONLY RECEIPT # Al	MOUNT	APPLYING IFP	JUDGE	MAG. JUI) OGE			

Case: 3:20-cv-01281 Doc #: 1-1 Filed: 06/11/20 2 of 3. PageID #: 8

UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF OHIO

I.	Civil Categories: (Pleas	e check one category only).		
	1. Ger	neral Civil		
	=	ninistrative Review/S	ocial Security	
		eas Corpus Death F	•	
	*If under Title 28, §2255, name the	ne SENTENCING JUDGE:		
		CASE NUMBER:		
II.	RELATED OR REFILED CASES. Sand assigned to a District Judge subsequently refiled, it shall be the place of holding court in which bringing such cases to the attention	after which it is discontinued assigned to the same Judge v ich the case was refiled. Cou	, dismissed or remanded who received the initial cas unsel or a party without co	to a State court, and e assignment without regardfor ounsel shall be responsible for
	This action: is RELATED to	another PENDING civil case	is a REFILED case	was PREVIOUSLY REMANDED
If app	licable, please indicate on page 1 i	n section VIII, the name of the	e Judge and case numbe	r.
III.	In accordance with Local Civil R divisional offices therein. Action purpose of determining the properties.	s involving counties in the We	estern Division shall be file	ed at the Toledo office. For the
	ANSWER ONE PARAGRAPH ON PARAGRAPH APPLIES TO YOUR			ON FINDING WHICH
	(1) Resident defendant. If t county COUNTY:	he defendant resides in a cou	nty within this district, ple	ase set forth the name of such
	Corporation For the purpose of a it has its principal place of busin		oration is deemed to be a	resident of that county in which
		nt. If no defendant is a reside tion arose or the event compla	-	rict, please set forth the county
	place of business within		action arose or the event	corporation not having a principle complained of occurred outside
IV.	The Counties in the Northern Dis determined in Section III , please			After the county is
	EASTERN DIVISION			
	AKRON CLEVELAND	(Counties: Carroll, Holmes (Counties: Ashland, Ashta	bula, Crawford, Cuyahoga	
	YOUNGSTOWN	Lorain, Medina (Counties: Columbiana, Ma		
	WESTERN DIVISION	ŕ	- ,	
	TOLEDO		rcer, Ottawa, Paulding, P	ncock, Hardin, Henry, utnam, Sandusky, Seneca
		VanWert, Williams, Wood	and Wyandot)	

JS 44 Reverse (Rev. 09/19) Case: 3:20-cv-01281 Doc #: 1-1 Filed: 06/11/20 3 of 3. PageID #: 9

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- **I.(a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
- (b) County of Residence. For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
- (c) Attorneys. Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. Jurisdiction. The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.

United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here. United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.

Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.

Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)

- III. Residence (citizenship) of Principal Parties. This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit. Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: Nature of Suit Code Descriptions.
- V. Origin. Place an "X" in one of the seven boxes.

Original Proceedings. (1) Cases which originate in the United States district courts.

Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441.

Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date

Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date. Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.

Multidistrict Litigation – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.

Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.

PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7. Origin Code 7 was used for historical records and is no longer relevant due to changes in statue.

- VI. Cause of Action. Report the civil statute directly related to the cause of action and give a brief description of the cause. Do not cite jurisdictional statutes unless diversity. Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service
- VII. Requested in Complaint. Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.

 Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction. Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases. This section of the JS 44 is used to reference related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

Date and Attorney Signature. Date and sign the civil cover sheet.

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO

WESTERN DIVISION

UNITED STATES OF AMERICA,)	CIVIL ACTION NO.
Plaintiff,)	JUDGE
Tiumini,)	*CDGL
V.)	
)	
\$7,877.00 IN U.S. CURRENCY SEIZED)	
ON JANUARY 17, 2020,)	
)	
Defendant.)	<u>PRAECIPE</u>

Please issue a Warrant of Arrest in Rem on the Defendant \$7,877.00 in U.S. Currency seized on January 17, 2020, to the United States Marshals Service on behalf of the United States Attorney's Office.

Respectfully submitted,

Justin E. Herdman
United States Attorney

By:

Henry F. DeBaggis (OH: 0007561) Assistant United States Attorney

801 West Superior Avenue

Suite 400

Cleveland, OH 44113-1852

Tel. (216) 622-3749 Fax. (216) 522-7499

Henry.DeBaggis@usdoj.gov

Case: 3:20-cv-01281 Doc #: 1-3 Filed: 06/11/20 1 of 1. PageID #: 11

United States District Court

NORTHERN DISTRICT OF OHIO

WARRANT OF ARREST IN REM

WHEREAS, on 6/11/2020 a Complaint in Forfeiture was filed in this Court by Justin E. Herdman, United States Attorney for this District, on beha States, against: \$7,877.00 in U.S. Currency (CATS ID: 20-USP-000916) and WHEREAS, the defendant properties are currently in the possession, custody or constates; and,	control of the United
and WHEREAS, the defendant properties are currently in the possession, custody or co	laims and Asset
	laims and Asset
WHEREAS, Rule G(3)(b)(i) of the Supplemental Rules for Admiralty or Maritime Confeiture Actions directs the Clerk of the Court to issue a warrant of arrest <i>in rem</i> for the arrest properties; and,	
WHEREAS, Rule G(3)(c) of the Supplemental Rules for Admiralty or Maritime Cla Forfeiture Actions provides that the warrant of arrest <i>in rem</i> must be delivered to a person of authorized to execute it;	
YOU ARE COMMANDED to arrest the defendant properties by serving a copy of this custodian in whose possession, custody or control the properties are presently found, and to us may be appropriate to protect and maintain it in your custody until further order of this Court.	se whatever means
YOU ARE FURTHER COMMANDED to file the same in this Court with your return	n thereon.
WITNESS THE HONORABLE UNITED STATES DISTRICT JUDGE AT	
DATE CLERK	
(BY) DEPUTY CLERK	
Returnable60days after issue.	
United States Marshals Service	
tes Marshals Service	EXECUTED
PRINTED NAME SIGNATURE	

Case: 3:20-cv-01281 Doc #: 1-4 Filed: 06/11/20 1 of 1. PageID #: 12 U.S. Department of Justice PROCESS RECEIPT AND RETURN

PLAINTIFF							COURT CASE NUME	BER	
DEFENDANT						TYPE OF PROCESS			
SERVE AT	NAME OF INDIV					ESCRIPT	ION OF PROPERTY TO	O SEIZE (OR CONDEMN
SEND NOTICE O	SEND NOTICE OF SERVICE COPY TO REQUESTER AT NAME AND ADDRESS BELOW Number of process to be served with this Form								
						mber of parties to be wed in this case			
							eck for service U.S.A.		
	RUCTIONS OR OT umbers, and Estim				T IN EXPEDITING S	ERVICE ((Include Business and A	Alternate A	Addresses, Fold
<u></u>									1010
-	Signature of Attorney other Originator requesting service on behalf of: PLAINTIFF TELEPHONE NUMBER DATE								
SPACE BE	LOW FOR U	JSE BY PI	ROCESS	ING OFFI	CIAL ONLY -	DO N	OT WRITE BEI	T WO	HIS LINE
I acknowledge receipt for the total number of process indicated. Total Process District of Origin District to Serve Signature of Authorized Agent or Other Agency Personnel Date				Date					
	No No								
I hereby certify and return that I \square have personally served , \square have legal evidence of service, \square have executed as shown in "Remarks", the process described on the individual , company, corporation, etc., at the address shown above on the individual , company, corporation, etc. shown at the address inserted below.									
I hereby certi	fy and return that I	am unable to lo	cate the indi	vidual, company	, corporation, etc. name	ed above ((See remarks below)		
Name and title of individual served (if not shown above) A person of suitable age and discretion then residing in defendant's usual place of abode									
Address (complete only different than shown above) Date Time					☐ an				
Signature									
Service Fee	Total Mileage Chincluding endeave		ling Fee	Total Charges	Advance Deposits		ount owed ount of Refund*)		
REMARKS:									

PRIOR EDITIONS MAY BE USED

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO

WESTERN DIVISION

UNITED STATES OF AMERICA,			CIVIL ACTION NO.
P	laintiff,)	JUDGE
v.)	
\$7,877.00 IN U.S. CUR ON JANUARY 17, 202)	
Defen	dant.)	<u>NOTICE</u>
Party-in-Interest:	Joel Veizer c/o Brad Hubb	ole, Esc] .

c/o Brad Hubble, Esq.
411 N. Michigan Avenue

Toledo, Ohio 43604

The above-captioned forfeiture action was filed in U.S. District Court on June 11, 2020.

A copy of the complaint is attached. If you claim an interest in the defendant property, the following applies.

Pursuant to Rule G of the Supplemental Rules for Admiralty or Maritime and Asset
Forfeiture Claims, you are required to file with the Court, and serve upon Henry F. DeBaggis,
plaintiff's attorney, whose address is United States Attorney's Office; United States Court House;
801 West Superior Avenue, Suite 400; Cleveland, Ohio 44113, a verified claim to the defendant
property within thirty-five (35) days after your receipt of the complaint. Said claim shall
contain the information required by Rule G(5) of the said Supplemental Rules. Additionally,
you must file and serve an answer to the complaint or a motion under Rule 12 of the Civil Rules

Case: 3:20-cv-01281 Doc #: 1-5 Filed: 06/11/20 2 of 2. PageID #: 14

of Procedure, within twenty (20) days after the filing of the claim, exclusive of the date of filing. If you fail to do so, judgment by default will be taken for the relief demanded in the complaint.

Respectfully submitted,

Justin E. Herdman
United States Attorney

By:

Henry F. DeBaggis (OH: 0007561) Assistant United States Attorney 801 West Superior Avenue Suite 400

Cleveland, OH 44113-1852 Tel. (216) 622-3749 Fax. (216) 522-7499

Henry.DeBaggis@usdoj.gov